

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROBERT MICHAELSON OF ADVISORY  
TRUST GROUP, LLC, IN HIS CAPACITY  
AS DEBTOR REPRESENTATIVE AND  
LIQUIDATING TRUSTEE,

Plaintiff,

v.

PETER BARONOFF, KEITH REUBEN,  
BRIAN DUNN, DAVID ARMSTRONG,  
JAMES HOPWOOD, RICHARD GOLD,  
BRYAN DAY, STAN GRABISH, RICHARD  
COHEN, STEVEN HELLAND, MALINDA  
BARONOFF, SHANNA BARONOFF, and  
JOHN DOES 1-100,

Defendants.

**CASE NO: 20-cv-01465-MN**

**PLAINTIFF'S NOTICE OF CONSENT TO TRANSFER VENUE**

Robert Michaelson of Advisory Trust Group, LLC, in his capacity as Debtor  
Representative and Liquidating Trustee (“Plaintiff”) of the estates of Promise Healthcare Group,  
LLC and its debtor affiliates (the “Debtors”),<sup>1</sup> by and through his undersigned counsel, hereby

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<sup>1</sup> The Debtors in the chapter 11 cases captioned *In re Promise Healthcare Group, LLC* et al., Case No. 18-12491 (the “Bankruptcy Cases”), now pending in the United States Bankruptcy Court for the District of Delaware, together with the last four digits of each Debtor’s federal tax identification number, are as follows: HLP HealthCare, Inc. (8381), PH-ELA, Inc. (9180), Promise Healthcare #2, Inc. (1913), Promise Healthcare Group, LLC (1895), Promise Healthcare Holdings, Inc. (2601), Bossier Land Acquisition Corp. (6644), HLP of Los Angeles, LLC (9102), HLP of Shreveport, Inc. (1708), HLP Properties at The Villages Holdings, LLC (0006), HLP Properties at the Villages, L.L.C. (1938), HLP Properties of Vidalia, LLC (4255), HLP Properties, Inc. (0068), Promise Healthcare of California, Inc. (9179), Promise Healthcare, Inc. (7953), Promise Hospital of Ascension, Inc. (9219), Promise Hospital of Baton Rouge, Inc. (8831), Promise Hospital of Dade, Inc. (7837), Promise Hospital of Dallas, Inc. (0240), Promise Hospital of East Los Angeles, L.P. (4671), Promise Hospital of Florida at The Villages, Inc.

files this *Notice of Consent to Transfer Venue* (the “Notice of Consent”) whereby Plaintiff consents to certain of the relief requested in (i) *The Baronoff Defendants’ Motion to Transfer Venue, or Alternatively, to Dismiss* [Docket Nos. 31 and 32] and (ii) *Keith Reuben’s Notice of Joinder in Motion to Transfer Venue* [Docket No. 38] (collectively, the “Transfer Motions”) solely with respect to the transfer of venue of this action to the United States District Court for the Southern District of Florida, as set forth in the Proposed Order attached hereto as Exhibit A.

For the avoidance of doubt, this Notice of Consent does not apply to any other requests for relief in the Transfer Motions and nothing herein shall constitute a waiver or limitation of any rights, claims, defenses or objections of the Plaintiff and/or the Debtors’ estates with respect to the Transfer Motions, except with respect to the transfer of venue, or any other motions or pleadings filed by any of the Defendants in this action.

Dated: April 16, 2021

/s/ Bradford J. Sandler  
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(2171), Promise Hospital of Louisiana, Inc. (4886), Promise Hospital of Lee, Inc. (8552), Promise Hospital of Overland Park, Inc. (5562), Promise Hospital of Phoenix, Inc. (1318), Promise Hospital of Salt Lake, Inc. (0659), Promise Hospital of Vicksburg, Inc. (2834), Promise Hospital of Wichita Falls, Inc. (4104), Promise Properties of Dade, Inc. (1592), Promise Properties of Lee, Inc. (9065), Promise Properties of Shreveport, LLC (9057), Promise Skilled Nursing Facility of Overland Park, Inc. (5752), Promise Skilled Nursing Facility of Wichita Falls, Inc. (1791), Quantum Health, Inc. (4298), Quantum Properties, L.P. (8203), Success Healthcare 1, LLC (6535), Success Healthcare, LLC (1604), Vidalia Real Estate Partners, LLC (4947), LH Acquisition, LLC (2328), Promise Behavioral Health Hospital of Shreveport, Inc. (1823), Promise Rejuvenation Centers, Inc. (7301), Promise Rejuvenation Center at the Villages, Inc. (7529), and PHG Technology Development and Services Company, Inc. (7766).

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- and –

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*Counsel to Robert Michaelson of Advisory Trust  
Group, LLC, in his capacity as Debtor  
Representative and Liquidating Trustee*